

## **REMARKS/ARGUMENTS**

Claims 1-7 are pending in the application. Claims 1-3 and 5-7 have been rejected. Claims 1-3 and 5-7 have been amended in order to more clearly point out and more distinctly claim the subject matter which the Applicant considers to be the invention. •

### **Rejections under 35 U.S.C. §103**

The Office Action rejected claims 1-3 and 5 under 35 U.S.C. § 103(a) as unpatentable over Lindhorst (U.S. Patent 6,337,696) in view of Doyle (U.S. Patent 4,928,247). Applicant respectfully traverses the rejection for the following reasons.

Claim 1 relates to a process modeling tool for graphically representing a process which includes transactions and events. The process modeling tool includes a computer system including a display device, a data storage device, and a user interface device. The process modeling tool further includes a graphical tool which a user operates through the user interface device to create a graphical representation of the transactions and events with graphical symbols shown on the display device, where one or more of such transactions and events may be of an asynchronous nature. Asynchronous transactions or events occur in parallel, i.e., they occur independently without reference to a standard clock.

Lindhorst discloses a method for creating and editing event handlers that link events triggered on one object to actions taken on one or more different objects. The method provides a user interface having an event pane, action pane, and code pane. A user selects an event icon in the event pane to link that event to a desired action in the action pane. The code that is generated in the code pane can be displayed in either a list view or a code view. In the list view, the event handler is presented to the user in statements that a user can understand. In the code view, the actual event handler code in either VBScript or JavaScript languages is presented to the user.

In the Office Action, the Examiner claims that elements of claim 1 are disclosed by the Lindhorst reference. The Office Action, however, concedes that Lindhorst does not disclose transactions and events of an asynchronous nature (see Office Action page 2). The Examiner proceeds to contend that Doyle teaches this element and that it would have been obvious to one skilled in the art to incorporate the teaching of Doyle into the method of Lindhorst. Applicant

respectfully submits that the elements of claim 1 are not present in either the Lindhort reference, the Doyle reference, or any combination of the Lindhorst and Doyle references.

Doyle relates to a computer graphics workstation and, more particularly, to a high performance, stand-alone graphics workstation including a digital computer host and a graphics processing subsystem. Doyle discloses control structures to optimize utilization of system resources and both two-dimensional and three-dimensional high resolution graphics displays (see Abstract). The system disclosed by Doyle comprises a host central processing unit connected to a graphics subsystem. The host subsystem is operable to execute one or more application programs residing in the host to build graphics data structures representing two dimensional and/or three-dimensional objects to be displayed. The graphics data structures are stored in a structure memory component in the graphics subsystem. The three-dimensional graphics data structures are each implemented as a hierarchical graphics data node structure in the structure memory (see col. 2 lines 25-41).

Doyle further discloses an asynchronously operational structure walker in the graphics subsystem traversing a control structure stored in the structure memory on a continuing basis to read and process requests for traversal of the nodes of the graphics structures and to send the data and command information contained in the nodes down a graphics pipeline for processing, manipulation and display by the graphics processing components of the graphics subsystem (see col. 2 lines 53-61).

Thus, Doyle is fundamentally directed to a method for reading and displaying graphics structures, stored in memory, more efficiently. Note that a graphics structure is defined by Doyle as a data structure in memory that represents a graphical object, such as a three-dimensional object (see col. 1 lines 49-55). Doyle does not make any mention of a process modeling tool for graphically representing processes (including transactions or events); Doyle only mentions displaying graphics structures. Doyle further makes no mention of any of the elements of claim 1, namely the graphical representation of transactions and events that are asynchronous. Doyle does disclose the asynchronous traversal of a data structure stored in memory for display of the data structure by the graphics subsystem (see col. 2 lines 53-61). Doyle's reference to asynchronicity, however, refers to asynchronous traversal of a data object, not a graphical object. In the Doyle reference, a data object containing graphics data is traversed by a routine and the

graphics data is processed for display on a monitor. This is vastly different from the element of claim 1 of the Applicant's invention, wherein asynchronous transactions and events are represented by graphical objects. Thus, to say that the Doyle reference discloses asynchronous transactions and events that are represented by graphical objects would not be a proper characterization of the Doyle reference.

The Examiner states that "Doyle discloses transactions and events may be of an asynchronous nature" and then refers to col. 1, lines 15-20 of the Doyle reference. A reading of that passage, however, reveals that Doyle is referring to asynchronous components, not to asynchronous transactions and events that are represented by graphical objects, as required in claim 1.

For these reasons, neither the Lindhorst reference nor the Doyle reference, nor any combination of the two, disclose, teach, or suggest the aforementioned element of claim 1 - namely, the graphical representation of asynchronous transactions and events by a process modeling tool. Thus, the Examiner's rejection of this claim has been traversed and the Applicant respectfully requests that the rejection is withdrawn.

Amended claims 2-3 and 5 also include a claim element relating to the graphical representation of asynchronous transactions and events by a process modeling tool. Thus, for the same reasons as claim 1 above, neither the Lindhorst reference nor the Doyle reference, nor any combination of the two, disclose, teach or suggest the aforementioned element of claims 2-3 and 5 - namely, the graphical representation of asynchronous transactions and events by a process modeling tool. Thus, the Examiner's rejection of these claims have been traversed and the Applicant respectfully requests that the rejection is withdrawn.

The Office Action further rejected claims 6-7 as unpatentable over Lindhorst (U.S. Patent 6,337,696) in view of Doyle (U.S. Patent 4,928,247) and further in view of the background section of the Applicant's specification. Applicant respectfully traverses the rejection for the following reasons.

Amended claim 6 includes a claim element relating to the graphical representation of asynchronous transactions and events by a process modeling tool. Thus, for the same reasons as claim 1 above, neither the Lindhorst reference nor the Doyle reference nor the Applicant's specification, nor any combination of these references, disclose, teach, or suggest the

aforementioned element of claim 6 - namely, the graphical representation of asynchronous transactions and events by a process modeling tool.

Further with respect to claim 6, the Examiner states that the prior art discloses elements of claim 6. The Examiner concedes in the Office Action, however, that Lindhorst does not disclose the claim elements of: traversing the graphical representation of the process and generating computer code to represent functions and execution flow within the process (see Office Action page 5). However, the Office Action contends that Doyle teaches this element (without contending that it would have been obvious to one skilled in the art to incorporate the teaching of Doyle into the method of Lindhorst). Applicant respectfully submits that the elements of claim 6 are not present in the Lindhorst reference, the Doyle reference, the Applicant's specification or any combination of these references.

As explained above, Doyle discloses the asynchronous traversal of a data structure stored in memory for display of the data structure by the graphics subsystem (see col. 2 lines 53-61). Doyle's reference to a traversal, however, refers to asynchronous traversal of a data object, not a graphical object. In the Doyle reference, a data object containing graphics data is asynchronously traversed by a routine and the graphics data is processed for display on a monitor. This is vastly different, however, from the element of claim 6 of the Applicant's invention, wherein graphical objects representing asynchronous transactions and events are traversed. That is, in the Applicant's invention, it is the graphical objects themselves that are asynchronous - the traversal of the graphical objects is not necessarily asynchronous. Thus, to say that the Doyle reference anticipates the traversal of a graphical object representing an asynchronous object would not be a proper characterization of the Doyle reference.

The Examiner states that "Doyle discloses to traverses the graphical representation and information received from the traversal tool" and then refers to col. 2 lines 65-68, col. 3 lines 1-5 and col. 14 lines 18-27 of the Doyle reference. A reading of those passages, however, reveals that Doyle is referring to asynchronous traversal of data objects, not the traversal of asynchronous transactions and events that are represented by graphical objects, as disclosed in claim 6.

Thus, for this additional reason, neither the Lindhorst reference, the Doyle reference, the Applicant's specification, nor any combination of these references, disclose, teach or suggest the

aforementioned element of claim 6 - namely, the traversal of graphical representations of asynchronous transactions and events by a process modeling tool. Thus, the Examiner's rejection of this claim has been traversed and the Applicant respectfully requests that the rejection is withdrawn.

Amended claim 7 also includes a claim element relating to the traversal of graphical representations of asynchronous transactions and events by a process modeling tool. Thus, for the same reasons as claim 6 above, neither the Lindhorst reference, the Doyle reference, the Applicant's specification, nor any combination of these references, disclose, teach or suggest the aforementioned element of claim 6 - namely, the traversal of graphical representations of asynchronous transactions and events by a process modeling tool. Thus, the Examiner's rejection of this claim has been traversed and the Applicant respectfully requests that the rejection is withdrawn.

#### **Allowable Subject Matter**

The Office Action found claim 4 to be allowable. The Applicant thanks the Examiner for this finding.